



City of Boston  
Law

June 10, 2022

VIA FIRST-CLASS MAIL

United States District Court  
District of Massachusetts  
Civil Clerk's Office  
John Joseph Moakley U.S. Courthouse  
1 Courthouse Way, Suite 2300  
Boston, MA 02210

RE: FTF Lending LLC, a Delaware Limited Liability Company  
v. *TNotes Investment LLC, a Massachusetts Limited  
Liability Company, City of Boston, et al.*  
U.S. District Court No. 1:22-cv-10700  
COB No.22-0682

Dear Sir or Madam:

In connection with the above-reference matter, please find for filing the enclosed *Defendant Collector-Treasurer of the City of Boston's Answer to Plaintiff's Complaint*.

Thank you for your attention to this matter. Please feel free to contact me with any questions or concerns.

Very truly yours,

  
Jaclyn R. Munson  
Assistant Corporation Counsel  
617-635-4936

JRM/jlf  
Enclosure

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

Civil Action No.: 1:22-cv-10700-WGY

FTF Lending LLC	)
	)
Plaintiff,	)
	)
v.	)
	)
TNotes Investment LLC, et al.	)
	)
Defendant.	)
	)

**DEFENDANT COLLECTOR-TREASURER OF THE CITY OF BOSTON'S ANSWER**  
**TO PLAINTIFF'S COMPLAINT**

The Defendant, City of Boston Collector-Treasurer ("the City"), hereby answers each numbered paragraph of the Plaintiff's Complaint as follows:

**INTRODUCTION**

The first paragraph of the Complaint is an introduction describing the lawsuit and as such does not require an answer. To the extent the first paragraph is deemed to contain factual allegations requiring a response, the City states it is without knowledge or information sufficient to form a belief as to the information contained in the first paragraph.

**PARTIES**

1. The City is without knowledge or information sufficient to form a belief as to the truth or veracity of the statements contained in Paragraph One of the Plaintiff's Complaint.
2. The City is without knowledge or information sufficient to form a belief as to the truth or veracity of the statements contained in Paragraph Two of the Plaintiff's Complaint.
3. The City is without knowledge or information sufficient to form a belief as to the truth or veracity of the statements contained in Paragraph Three of the Plaintiff's Complaint.
4. Admitted to the extent that the City of Boston is a municipal corporation in the Commonwealth of Massachusetts.

5. The City is without knowledge or information sufficient to form a belief as to the truth or veracity of the statements contained in Paragraph Five of the Plaintiff's Complaint.
6. The City is without knowledge or information sufficient to form a belief as to the truth or veracity of the statements contained in Paragraph Six of the Plaintiff's Complaint.
7. The City is without knowledge or information sufficient to form a belief as to the truth or veracity of the statements contained in Paragraph Seven of the Plaintiff's Complaint.
8. The City is without knowledge or information sufficient to form a belief as to the truth or veracity of the statements contained in Paragraph Eight of the Plaintiff's Complaint.
9. The City is without knowledge or information sufficient to form a belief as to the truth or veracity of the statements contained in Paragraph Nine of the Plaintiff's Complaint.
10. The City is without knowledge or information sufficient to form a belief as to the truth or veracity of the statements contained in Paragraph Ten of the Plaintiff's Complaint.
11. The City is without knowledge or information sufficient to form a belief as to the truth or veracity of the statements contained in Paragraph Eleven of the Plaintiff's Complaint.
12. The City is without knowledge or information sufficient to form a belief as to the truth or veracity of the statements contained in Paragraph Twelve of the Plaintiff's Complaint.

#### **JURISDICTION AND VENUE**

13. Paragraph Thirteen contains a legal conclusion to which no response is required. To the extent a response is required, the City is without knowledge or information sufficient to form a belief as to the truth or veracity of the statements contained in Paragraph Thirteen of the Plaintiff's Complaint.
14. Paragraph Fourteen contains a legal conclusion to which no response is required. To the extent a response is required, the City is without knowledge or information sufficient to form a belief as to the truth or veracity of the statements contained in Paragraph Fourteen of the Plaintiff's Complaint.

#### **BACKGROUND AND GENERAL ALLEGATIONS**

15. The City is without knowledge or information sufficient to form a belief as to the truth or veracity of the statements contained in Paragraph Fifteen of the Plaintiff's Complaint.
16. The City is without knowledge or information sufficient to form a belief as to the truth or veracity of the statements contained in Paragraph Sixteen of the Plaintiff's Complaint.



17. The City is without knowledge or information sufficient to form a belief as to the truth or veracity of the statements contained in Paragraph Seventeen of the Plaintiff's Complaint.
18. The City is without knowledge or information sufficient to form a belief as to the truth or veracity of the statements contained in Paragraph Eighteen of the Plaintiff's Complaint.
19. The City is without knowledge or information sufficient to form a belief as to the truth or veracity of the statements contained in Paragraph Nineteen of the Plaintiff's Complaint.
20. The City is without knowledge or information sufficient to form a belief as to the truth or veracity of the statements contained in Paragraph Twenty of the Plaintiff's Complaint.
21. The City is without knowledge or information sufficient to form a belief as to the truth or veracity of the statements contained in Paragraph Twenty-One of the Plaintiff's Complaint.
22. The City is without knowledge or information sufficient to form a belief as to the truth or veracity of the statements contained in Paragraph Twenty-Two of the Plaintiff's Complaint.
23. The City is without knowledge or information sufficient to form a belief as to the truth or veracity of the statements contained in Paragraph Twenty-Three of the Plaintiff's Complaint.
24. The City is without knowledge or information sufficient to form a belief as to the truth or veracity of the statements contained in Paragraph Twenty-Four of the Plaintiff's Complaint.

**COUNT ONE - BREACH OF NOTE**  
**(AS ONLY TO DEFENDANT TNOTES INVESTMENT LLC)**

25. The City repeats and incorporates each response contained in the foregoing paragraphs as specifically set forth herein.
26. The City is without knowledge or information sufficient to form a belief as to the truth or veracity of the statements contained in Paragraph Twenty-Six of the Plaintiff's Complaint.
27. The City is without knowledge or information sufficient to form a belief as to the truth or veracity of the statements contained in Paragraph Twenty-Seven of the Plaintiff's Complaint.

28. The City is without knowledge or information sufficient to form a belief as to the truth or veracity of the statements contained in Paragraph Twenty-Eight of the Plaintiff's Complaint.
29. The City is without knowledge or information sufficient to form a belief as to the truth or veracity of the statements contained in Paragraph Twenty-Nine of the Plaintiff's Complaint.
30. The City is without knowledge or information sufficient to form a belief as to the truth or veracity of the statements contained in Paragraph Thirty of the Plaintiff's Complaint.
31. The City is without knowledge or information sufficient to form a belief as to the truth or veracity of the statements contained in Paragraph Thirty-One of the Plaintiff's Complaint.
32. The City is without knowledge or information sufficient to form a belief as to the truth or veracity of the statements contained in Paragraph Thirty-Two of the Plaintiff's Complaint.
33. The City is without knowledge or information sufficient to form a belief as to the truth or veracity of the statements contained in Paragraph Thirty-Three of the Plaintiff's Complaint.
34. The City is without knowledge or information sufficient to form a belief as to the truth or veracity of the statements contained in Paragraph Thirty-Four of the Plaintiff's Complaint.

**COUNT TWO - BREACH OF THE GUARANTY**  
**(AS ONLY TO DEFENDANT NOTO)**

35. The City repeats and incorporates each response contained in the foregoing paragraphs as specifically set forth herein.
36. The City is without knowledge or information sufficient to form a belief as to the truth or veracity of the statements contained in Paragraph Thirty-Six of the Plaintiff's Complaint.
37. The City is without knowledge or information sufficient to form a belief as to the truth or veracity of the statements contained in Paragraph Thirty-Seven of the Plaintiff's Complaint.
38. The City is without knowledge or information sufficient to form a belief as to the truth or veracity of the statements contained in Paragraph Thirty-Eight of the Plaintiff's Complaint.

39. The City is without knowledge or information sufficient to form a belief as to the truth or veracity of the statements contained in Paragraph Thirty-Nine of the Plaintiff's Complaint.

40. The City is without knowledge or information sufficient to form a belief as to the truth or veracity of the statements contained in Paragraph Forty of the Plaintiff's Complaint.

41. The City is without knowledge or information sufficient to form a belief as to the truth or veracity of the statements contained in Paragraph Forty-One of the Plaintiff's Complaint.

**COUNT THREE - FORECLOSURE OF MORTGAGE**  
**(AS TO ALL DEFENDANTS)**

42. The City repeats and incorporates each response contained in the foregoing paragraphs as specifically set forth herein.

43. The City is without knowledge or information sufficient to form a belief as to the truth or veracity of the statements contained in Paragraph Forty-Three of the Plaintiff's Complaint.

44. The City is without knowledge or information sufficient to form a belief as to the truth or veracity of the statements contained in Paragraph Forty- Four of the Plaintiff's Complaint.

45. The City is without knowledge or information sufficient to form a belief as to the truth or veracity of the statements contained in Paragraph Forty-Five of the Plaintiff's Complaint.

46. The City is without knowledge or information sufficient to form a belief as to the truth or veracity of the statements contained in Paragraph Forty-Six of the Plaintiff's Complaint.

47. The City is without knowledge or information sufficient to form a belief as to the truth or veracity of the statements contained in Paragraph Forty-Seven of the Plaintiff's Complaint.

48. The City is without knowledge or information sufficient to form a belief as to the truth or veracity of the statements contained in Paragraph Forty-Eight of the Plaintiff's Complaint.

49. The City is without knowledge or information sufficient to form a belief as to the truth or veracity of the statements contained in Paragraph Forty-Nine of the Plaintiff's Complaint.

50. The City is without knowledge or information sufficient to form a belief as to the truth or veracity of the statements contained in Paragraph Fifty of the Plaintiff's Complaint.



51. The City is without knowledge or information sufficient to form a belief as to the truth or veracity of the statements contained in Paragraph Fifty-One of the Plaintiff's Complaint.

52. Admitted.

53. Admitted.

54. Admitted.

55. Admitted.

56. Admitted.

57. Admitted.

58. Admitted.

59. Admitted.

60. Admitted.

61. Admitted.

62. Admitted.

63. Admitted.

64. Admitted.

65. The City is without knowledge or information sufficient to form a belief as to the truth or veracity of the statements contained in Paragraph Sixty-Five of the Plaintiff's Complaint.

66. The City is without knowledge or information sufficient to form a belief as to the truth or veracity of the statements contained in Paragraph Sixty-Six of the Plaintiff's Complaint.

67. The City is without knowledge or information sufficient to form a belief as to the truth or veracity of the statements contained in Paragraph Sixty-Seven of the Plaintiff's Complaint.

68. The City is without knowledge or information sufficient to form a belief as to the truth or veracity of the statements contained in Paragraph Sixty-Eight of the Plaintiff's Complaint.

69. The City is without knowledge or information sufficient to form a belief as to the truth or veracity of the statements contained in Paragraph Sixty-Nine of the Plaintiff's Complaint.

70. The City is without knowledge or information sufficient to form a belief as to the truth or veracity of the statements contained in Paragraph Seventy of the Plaintiff's Complaint.

71. The City is without knowledge or information sufficient to form a belief as to the truth or veracity of the statements contained in Paragraph Seventy-One of the Plaintiff's Complaint.

72. The City is without knowledge or information sufficient to form a belief as to the truth or veracity of the statements contained in Paragraph Seventy-Two of the Plaintiff's Complaint.
73. The City is without knowledge or information sufficient to form a belief as to the truth or veracity of the statements contained in Paragraph Seventy-Three of the Plaintiff's Complaint.
74. The City is without knowledge or information sufficient to form a belief as to the truth or veracity of the statements contained in Paragraph Seventy-Four of the Plaintiff's Complaint.
75. The City is without knowledge or information sufficient to form a belief as to the truth or veracity of the statements contained in Paragraph Seventy-Five of the Plaintiff's Complaint.

WHEREFORE, the Defendant, City of Boston, prays that this Honorable Court establish the priority of the City's certificate of municipal liens and instrument of taking, against all other interests, and order the distribution of surplus funds to the City.

Respectfully submitted,

Defendant  
CITY OF BOSTON

By their attorney,  
Adam N. Cederbaum  
Corporation Counsel

CERTIFICATE OF SERVICE

I hereby certify that on this day a true copy of the above document was served upon the attorney of record for each party by first-class mail or electronic filing.

6/10/22  
Date

  
Jaclyn Munson

  
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